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10 *Hernandez, Julian Hernandez, Hector Moreno, and*  
11 *Danny Hernandez*

12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 AYDE AZUCCERA PEREZ GUTIERREZ, et al.

15 Plaintiffs,

16 vs.

17 MARISCOS EL PUERTO, INC., et al.

18 Defendants.

Case No.: 2:19-CV-1940 JCM

**STIPULATION AND  
ORDER TO EXTEND DEFENDANTS'  
DEADLINE TO FILE RESPONSE  
BRIEFS AND TO EXTEND  
PLAINTIFFS' DEADLINE TO FILE  
REPLY BRIEFS RELATING TO ECF  
NOS. 19 AND 20 AS SET FORTH IN  
THE ORDER ECF NO. 24**

**[FIRST REQUEST – TO EXTEND  
BRIEFING DEADLINE]**

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21 Defendants, Mariscos El Puerto, Inc.; La Catrina, LLC; La Catrina Entertainment, LLC;  
22 Manuela Hernandez; Julian Hernandez; Hector Moreno; and Danny Hernandez (collectively,  
23 “Defendants”), by and through counsel, Armstrong Teasdale LLP, and Plaintiffs Ayde Azuccera  
24 Perez Gutierrez, Brenda Karla Gabrela Reyes Medrano, Adriana Torres, Erika Socorro Valle Peralta,  
25 Salvador Vladimir Jimenez Flores, and Viridiana Ramirez Rodriguez (collectively, “Plaintiffs”), by  
26 and through counsel, Jakub P. Medrala of The Medrala Law Firm, hereby stipulate and agree:

27 (1) To extend the deadline for Defendants to file their opposition briefs to Plaintiffs’ Motion  
28 for Sanctions (ECF Nos. 19) and Plaintiffs’ Motion for Order to Show Cause (ECF No. 20) from

1 January 28, 2020, to January 31, 2020. This is the first request to extend Defendants' opposition  
2 deadline; and (2) To extend the deadline for Plaintiffs' to file their reply briefs in support of their  
3 Motion for Sanctions (ECF Nos. 19) and their Motion for Order to Show Cause (ECF No. 20) from  
4 January 31, 2020, to February 5, 2020.

5 Pursuant to Fed. R. Civ. P. 6 and Local Rule LR IA 6-1, good cause exists to extend  
6 Defendants' opposition brief deadline. Counsel that has been primarily involved in the drafting of  
7 Defendants' briefing for this matter was out of the office last week due to medical reasons. Defense  
8 counsel's medical reasons have necessitated this need for a continuance. As such, Defendants seek a  
9 short extension of their opposition brief deadline to allow counsel the time necessary to fully  
10 participate in responding to Plaintiffs' Motion for Sanctions (ECF Nos. 19) and Plaintiffs' Motion  
11 for Order to Show Cause (ECF No. 20). And in turn, Defendants seek a short extension for  
12 Plaintiffs' replies to give them ample opportunity to file their reply briefs. Plaintiffs have no  
13 objection to this short extension of time. This case was initially filed on November 5, 2019, and  
14 these motions were filed on January 21, 2020, thus this short extension will not result in an  
15 unreasonable delay in having this matter decided. Furthermore, this stipulation is made in good faith  
16 and is not intended to unduly delay the proceedings.

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1 For all of the above-mentioned reasons, the parties respectfully request that this Court  
2 continue Defendants' opposition brief deadline from January 28, 2020, to January 31, 2020 and  
3 continue Plaintiffs' reply brief deadline from January 31, 2020, to February 5, 2020.

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5 Dated this 27<sup>th</sup> day of January, 2020.

6 **THE MEDRALA LAW FIRM**

7 By: /s/ Jakub P. Medrala  
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13 *Counsel for Plaintiffs*

Dated this 27<sup>th</sup> day of January, 2020.

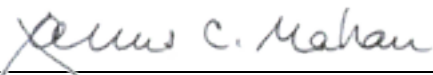
**ARMSTRONG TEASDALE LLP**

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Manuela Hernandez, Julian Hernandez, Hector  
Moreno, and Danny Hernandez*

**ORDER**

**IT IS SO ORDERED.**

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20 JAMES C. MAHAN  
21 UNITED STATES DISTRICT COURT JUDGE  
22 DATED: January 30, 2020  
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